

DOCKET SECTION
BEFORE THE
POSTAL RATE COMMISSION
WASHINGTON, D.C. 20268-0001

RECEIVED
SEP 25 2 14 PM '97
POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY

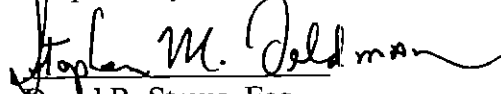
POSTAL RATE AND FEE CHANGES, 1997

)
)
)
Docket No. R97-1

**THE AMERICAN BUSINESS PRESS' FOLLOW-UP INTERROGATORY
TO USPS WITNESS MODEN
(ABP/USPS-T4-16)**

Pursuant to Sections 25 and 26 of the Commission's Rules of Practice, the American Business Press hereby submits the attached interrogatory to USPS Witness Moden, following up on his response to ABP/USPS-T26-6, redirected from Witness Seckar. If the designated witness is unable to respond to this interrogatory, we request a response by some other qualified witness.

Respectfully submitted,



David R. Straus, Esq.

Stephen M. Feldman, Esq.

THOMPSON COBURN

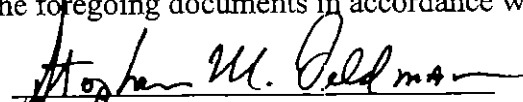
700 14th Street, N.W., Suite 900

Washington, D.C. 20005

Counsel for the American
Business Press

CERTIFICATE OF SERVICE

I hereby certify that I have this date served the foregoing documents in accordance with Section 12 of the Commission's Rules of Practice.



David R. Straus

Stephen M. Feldman

Dated: September 25, 1997

FOLLOW-UP INTERROGATORY
OF AMERICAN BUSINESS PRESS (ABP)
TO USPS WITNESS MODEN
(ABP/USPS-T4-16)

ABP/USPS-T4-16

As a follow-up to your response to ABP/USPS-T26-6(b), redirected from Witness Seckar, do you agree that the deployment of the FSM1000 if equipped with a barcode reader could reduce the makeup differences between flats that are now automated and flats that are now not automated but would be automated and machinable because of deployment of the FSM 1000? Please explain an affirmative or a negative answer..